## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

SAVANNAH COLLEGE OF ART AND

DESIGN, INC.,

Case No. C-1-02-490

(Judge Beckwith)

Plaintiff,

(Magistrate Hogan)

- vs -

PLAINTIFF'S MOTION FOR

: ADMISSION OF OUT-OF-STATE

**COUNSEL PRO HAC VICE** 

PHILIPPE HOUEIX,

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Defendant.

Pursuant to Local Rule 4.3(d), Plaintiff Savannah College of Art and Design, Inc. ("SCAD") respectfully moves the Court for an order allowing David J. Stewart and J. Patrick Elsevier to appear and participate as co-counsel for SCAD in this action. The grounds for the motion are set forth in the following memorandum in support.

Respectfully submitted,

Stephen J. Butler (0010401)

Theodore D. Lienesch., Esq. (0016542)

THOMPSON HINE LLP

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(513) 352-6700

Trial Attorneys for Plaintiff
Savannah College of Art and Design, Inc.

# OF COUNSEL:

Adele E. O'Conner PORTER, WRIGHT, MORRIS & ARTHUR LLP 250 East Fifth Street Suite 2200 Cincinnati, Ohio 45202 (513) 381-4700

David J. Stewart J. Patrick Elsevier ALSTON & BIRD LLP 1201 West Peachtree Street Atlanta, Georgia 30309 (404) 881-7000

#### MEMORANDUM IN SUPPORT

Plaintiff Savannah College of Art and Design wishes to have David J. Stewart and J. Patrick Elsevier participate as co-counsel in its defense of this action.

Mr. Stewart is a partner in the Atlanta, Georgia office of Alston & Bird LLP. He is a member in good standing of the bar of the State of Georgia. He has never been suspended, disbarred or otherwise disciplined by any court. In accordance with S.D. Ohio Local Rule 4.3(d), a current Certificate of Good Standing from the Supreme Court of Georgia for Mr. Stewart is attached.

Mr. Elsevier is an associate in the Atlanta, Georgia office of Alston & Bird LLP. He is a member in good standing of the bar of the State of Georgia. He has never been suspended, disbarred or otherwise disciplined by any court. In accordance with S.D. Ohio Local Rule 4.3(d), a current Certificate of Good Standing from the Supreme Court of Georgia for Mr. Elsevier is attached.

WHEREFORE, Plaintiff Savannah College of Art and Design respectfully requests that David J. Stewart and J. Patrick Elsevier be admitted to the bar of this Court for the purposes of appearing and participating in this action.

Respectfully submitted,

Stephen J. Butler (0010401)

Theodore D. Lienesch., Esq. (0016542)

THOMPSON HINE LLP

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### **CERTIFICATE OF SERVICE**

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